

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF DELAWARE**

In re

TPC GROUP INC, *et al.*,

Debtors,<sup>1</sup>

Chapter 11

Bankruptcy Case No. 22-10493 (CTG)

Jointly Administered

BAYSIDE CAPITAL, INC. and  
CERBERUS CAPITAL  
MANAGEMENT, L.P

*Plaintiffs-Appellants,*

v.

TPC GROUP INC.,

*Defendant-Appellee,*

-and-

THE AD HOC NOTEHOLDER GROUP,

*Intervenor-Defendant-Appellee*

Bankruptcy Adv. Proc. No. 22-50372  
(CTG)

Civ. Action No. \_\_\_\_\_

**DECLARATION OF OSCAR SHINE**

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<sup>1</sup> The Debtors in these chapter 11 cases, and the last four digits of their federal tax identification numbers, are: TPC Group Inc. (3618); TPC Holdings, Inc. (7380); TPC Group LLC (8313); Texas Butylene Chemical Corporation (7440); Texas Olefins Domestic International Sales Corporation (4241); TPC Phoenix Fuels LLC (9133); Port Neches Fuels, LLC (1641); and TP Capital Corp. (6248). Each Debtor's corporate headquarters and mailing address is 500 Dallas St., Suite 2000, Houston, Texas 77042.

OSCAR SHINE, pursuant to 28 U.S.C. § 1746, declares as follows:

1. I am a member of the law firm Selendy Gay Elsberg PLLC, counsel to Plaintiffs-Appellants Cerberus Capital Management, L.P and Bayside Capital, Inc. in the above-captioned Action. I submit this declaration in support of Plaintiffs-Appellants' Emergency Motion for Stay of Effectiveness and Enforcement of Order and Judgment Pending Appeal Pursuant to Bankruptcy Rule 8007, filed contemporaneously herewith.

2. Attached to this declaration as **Exhibit A** is a true and correct copy of a letter from Kristopher Hansen of Paul Hastings LLP, attorney for the Ad Hoc Noteholder Group, dated July 11, 2022.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on July 12, 2022

/s/

*Oscar Shine*

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Oscar Shine